

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

WANDA COOPER, in her individual
capacity and as administrator of the
estate of the decedent, Ahmaud Arbery,

Plaintiff,

v.

GEORGE BARNHILL et al.,

Defendants.

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CIVIL ACTION NO.
2:21-CV-00020-JRH

**DISTRICT ATTORNEY GEORGE BARNHILL’S MOTION TO TAKE JUDICIAL
NOTICE**

COMES NOW, District Attorney George Barnhill, Defendant in the above-styled case,
with this his Motion to Take Judicial Notice, showing this Honorable Court as follows:

IN SUPPORT of this motion, these Defendant states that the subject facts are “generally known within the trial court’s territorial jurisdiction” and the facts and documents “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” FRE 201(b). The court “must take judicial notice if a party requests it and the court is supplied with the necessary information.” FRE 201(c)(2).

1. Defendant requests that this Court take judicial notice of the facts contained in the “Statement of Facts and Allegations in the Complaint” section of the Brief in Support of Barnhill’s Motion to Dismiss. (Doc. 141). The facts are taken from the documents attached as Exhibits A and B to the Motion to Dismiss and were disseminated by the Georgia Attorney General’s Office.¹ (Docs. 141-1 and 141-2).

¹ The documents can be downloaded from the Georgia Attorney General’s website at: <https://bit.ly/law-georgia-gov-arbery-docs>

Although the Motion to Dismiss does not hinge on the admissibility or judicial notice of these facts or documents, each illuminates the story and background behind Plaintiff's claims and Defendant Barnhill's defenses. The documents that are attached as exhibits to Barnhill's Motion to Dismiss are mentioned repeatedly in the Amended Complaint and the authenticity of the documents is not at issue.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant this Motion by taking judicial notice of the facts and documents attached as Exhibits A, (Doc. 141-1), and B, (Doc. 141-2), to Defendant Barnhill's Motion to Dismiss, (Doc. 141).

This 29th day of August, 2022.

HENEFELD & GREEN, P.C.

/s/ Noah Green

Noah Green

Georgia Bar No. 468138

Attorney for Defendant Barnhill

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CERTIFICATE OF SERVICE

This is to certify that I have this day served all counsel of record with a copy of **Defendant Barnhill's Motion to Take Judicial Notice** by filing same with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

This 29th day of August, 2022.

HENEFELD & GREEN, P.C.

/s/ Noah Green

Noah Green

Georgia Bar No. 468138

Attorney for Defendant Barnhill

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